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Attorneys for Defendant  
INDUSTRIAL LIGHT AND MAGIC, a division of  
LUCASFILM ENTERTAINMENT COMPANY LTD.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

Case No. C 09-03502 CW

DREW KLAUSNER, an individual,

Plaintiff

vs.

LUCAS FILM ENTERTAINMENT  
COMPANY LTD, a California corporation;  
INDUSTRIAL LIGHT & MAGIC, a  
California corporation; and DOES 1-25,  
inclusive,

Defendants.

**STIPULATION FOR ORDER TO FILE  
CORRECTED DECLARATION OF STACY  
NORTH IN SUPPORT OF OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY  
JUDGMENT OR, ALTERNATIVELY,  
SUMMARY ADJUDICATION**

**STIPULATION OF THE PARTIES**

WHEREAS, on August 26, 2010, Plaintiff filed the Declaration of Stacy North in Support of Opposition to Defendant's Motion for Summary Judgment or, Alternatively, Summary Adjudication, Docket No. 48 ("North Declaration");

WHEREAS, excerpts from the Deposition of Michael Van Eps ("Van Eps Deposition") were attached to the North Declaration as Exhibit 2, including several exhibits that Defendant designated as Confidential or Attorneys' Eyes Only (the "Confidential Exhibits") under the Protective Order that the Court entered on March 22, 2010 (Docket # 29);

WHEREAS, Plaintiff does not agree with the appropriateness of the "Confidential" and "Attorneys Eyes Only" designations on the Confidential Exhibits;

WHEREAS, Defendant asserts that the Confidential Exhibits are appropriately designated because they include private employment information, including performance rankings, of non-parties;

WHEREAS, the Confidential Exhibits contain, among other things, the names of Defendant's employees;

WHEREAS, Defendant has requested, and Plaintiff is agreeable, to removing the North Declaration from the docket, redacting the employees' names from the Confidential Exhibits, and filing a Corrected North Declaration with redacted versions of the Confidential Exhibits;

WHEREAS, filing a Corrected North Declaration will not delay the summary judgment hearing, which is scheduled for September 16, 2010, or otherwise affect the schedule for this case.

THEREFORE, the Parties to this action, by and through their counsel of record, hereby stipulate and request the Court to order that the North Declaration, Docket No. 48, be withdrawn from the docket, and that Plaintiff be permitted to file a Corrected North Declaration (only with respect to redacting the employees' names from the Confidential Exhibits).

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IT IS SO STIPULATED.

DATED: \_\_\_\_\_, 2010

PIERCE & SHEARER LLP

By: \_\_\_\_\_

STACY Y. NORTH  
Attorneys for Plaintiff  
DREW KLAUSNER

DATED: \_\_\_\_\_, 2010

MARGOLIS & TISMAN LLP


By: \_\_\_\_\_

ROBERT M. LIEBER  
Attorneys for Defendant  
INDUSTRIAL LIGHT AND MAGIC, a  
division of LUCASFILM ENTERTAINMENT  
COMPANY LTD.

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/9/2010

  
\_\_\_\_\_  
HON. CLAUDIA WILKEN  
United States District Court Judge

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